

PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR SANCTIONS PURSUANT TO RULE 11 OF THE FEDERAL RULES OF CIVIL PROCEDURE

Plaintiff, Robert N. Goldstein and his counsel, Mark Falkin, according to Federal Rules of Civil Procedure and the argument set forth in the contemporaneously filed brief, responds to defendant's motion and moves this Court for an order denying defendant's motion and awarding plaintiff attorney's fees and costs in defense on this motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served upon counsel for defendant on the 9th day of July, 2001, as follows:

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